

**ATTACHMENT A**  
**Statement of Facts**

*The United States and Defendant Ronald Davis POPE stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below beyond a reasonable doubt. They further stipulate and agree that these are not all of the facts that the United States would prove if this case proceeded to trial.*

At all relevant times to this case, Defendant **RONALD DAVIS POPE ("POPE")** was a resident of Mechanicsville, Maryland.

In February 2013, **POPE** moved to a residence in Mechanicsville, Maryland to live with the family of Victim 1, a 14-year-old male. Between February and the beginning of May 2013, **POPE** shared a bathroom with Victim 1. During that time, **POPE** placed a watch containing a hidden camera in the bathroom in order to record Victim 1 in the shower and using the bathroom. The camera was placed in a location that would allow **POPE** to capture videos focused in on Victim 1's genital area. **POPE** then transferred those videos to his computer and cellular phone. Victim 1 was not aware that **POPE** was recording Victim 1 in the bathroom.

On May 2, 2013, federal and state law enforcement officials executed a search warrant at the residence in Mechanicsville where **POPE** resided with Victim 1's family. During the execution of that warrant, law enforcement officials seized electronic devices, including a Motorola model XT912 cellular telephone with SKU number CLNRMOTXT912, containing a Micro SanDisk SD card; and a HP Laptop with serial number 5CD2151KZM.

Forensic analysis of the SD card found within the Motorola cell phone revealed thirteen videos that appear to have been recorded off of a computer screen using the cell phone. The videos were initially taken with a hidden camera contained inside a watch that **POPE** left in the bathroom with the camera focused on the shower or toilet. The videos depict Victim 1 in various stages of undressing and dressing, showering, and using the restroom. Many of the videos also depict a shower curtain with fish on it that **POPE** purchased for the bathroom at some point after he moved into the residence in February 2013. In at least seven of the videos, which were all taken on separate occasions, Victim 1's penis is exposed. Moreover, the portion of Victim 1's body depicted in many of the videos (chest to legs) indicates that **POPE** placed the spy camera watch in a location in the bathroom designed to maximize **POPE's** ability to capture videos of Victim 1's genitals.

Forensic analysis of the HP laptop revealed five additional videos of Victim 1 in the bathroom getting into or out of the shower or using the restroom. Victim 1's penis is exposed in all of the videos. At least one of the five videos appears to be part of the same video that was also recovered on the Motorola cell phone.

During the execution of search warrant at the Mechanicsville residence on May 2, 2013, federal and state law enforcement officials interviewed **POPE**. During that interview, **POPE** stated that he had used his cell phone to record videos off the computer of a 14- or 15-year-old male showering, but he did not admit that he had surreptitiously recorded Victim 1 in Victim 1's own bathroom.



On May 7, 2013, a Federal Express shipment addressed to **POPE** arrived at the Mechanicsville residence. The package contained a Weather Clock Hidden Camera purchased from Brickhouse Security on May 1, 2013, one day before **POPE** was interviewed and arrested.

Similarly, in late May 2013, one of **POPE's** family members retrieved a package from a P.O. Box belonging to **POPE**. The package contained a HD Clock DVR, USB cord, and a 4GB Kingston Micro SD card received from a person in Shanghai, China.

In June 2013, federal law enforcement officials seized a black watch with a black rubber band used by **POPE** to record videos of Victim 1 in the bathroom. The watch band had an inscription that reads "CONTENT IS BETTER THAN RICHES." Subsequent forensic analysis of the watch camera memory revealed three videos, one of which depicts Victim 1 showering. Victim 1's penis is exposed in that video. The spy camera watch also contained an image of **POPE's** face.

The spy camera watch, Motorola cell phone, and HP laptop used in connection with the production of the child pornography described above were all manufactured outside the state of Maryland and therefore had to travel in interstate commerce to get to Maryland.

I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

3/21/2014  
Date

Ronald Davis Pope  
Ronald Davis Pope

I am Ronald Davis Pope's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is an informed and voluntary one.

2/21/2014  
Date

Michael CitaraManis  
Michael CitaraManis, Esq.